Case 1:06-cv-00465-SLR Document &4/17Filed \$88007 DESGET OF THE DISTRICT OF DELAWARD ANGELO CLARK PLAINT; FF, CIVIL ACTION NO-06:465 -5.L.R. CORRECTIONAL MEDICAD NITROGLYCERIN 0 4 MG/HR SERVICE'S DE FENAANTS DELAMINEMORANTUM BROCK STATE ANGELO LEE CHARK

A bout TEN DAY'S AGL CAME THAT WAS GILVED

OF AGREEMENT STATING THAT I WAS GILVED

TO BEREWARDED FOR SOME TYPE OF PURITIONS U.S. DISTRICT COURT DISTRICT OF DELAWAE MORAN PUM DAMAGE, AND IT WASN'T NO AGREE MENT NOR ARRANGE MEM TOTALE, BETWEEN ME OR OTHER PARTY Whore WAS THE AGREEMENT EXCUSE PAYMEN, T ISSUSED FROM The CORREctional MEDICAL SERVICES | This VIVIL Rights Action ON Duly 31, 2006 PURSUANT TO 42 45 C 1983 D.1.2) AND I AMMENDED STLORT LATER (D.I.8) ME, its quite 1 6 1= 40 PEO. PLE gett Neks LIANGELO CLARA PLAINTIFF FEE LAS Though I ARS RAJED BODY SOUL AN SILIT - IT LAPPERS A LOUT 4-8-PAYS JORK DOB WITH NO PAY, played with A HARD WORK DOB WITH NO PAY, played with A HARD WORK DOB WITH NO PAY, Played with A HARD WORK DOB WITH NO PAY, PLATED CASES 1:90-CV 00599-DD mm IN MAY NAME-AND I Neva 1256 7 SO I CONTINE SUFFER RELATED CASES 1:90-CV 00593-RRM NO A WALD HARESMAN MENT THANKS. CAUSE 42:1983 PRISONER PATRICK G. ROCK, CIVIL RIGHTS 913 NORTH MARKET STREET They Sust made saite 860 Wilm, 05, 19861 ME A Foot by I HAUG TO got TREAY MONT-302-658-6538 o Then pauple of my BONT Fit THANK YOU.

#### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

ANGELO CLARK,

Plaintiff,

v.

C. A. No. 06-465 - SLR

DISTRICT OF DELAWARE

REGIONAL MEDICAL FIRST CORRECTIONAL, MANAGER ANGELA WILSON

MANAGER ANGELA WILSON, AND CORRECTIONAL MEDICAL SERVICES,

Defendants.

TRIAL BY JURY OF TWELVE DEMANDED

# DEFENDANTS CORRECTIONAL MEDICAL SERVICES' FIRST SET OF REQUEST FOR PRODUCTION OF DOCUMENTS DIRECTED TO PLAINTIFF

Pursuant to Rule 34 of the Federal District Court Rules of Civil Procedure, you are hereby requested to produce the below listed documents and/or items for purposes of discovery. This material will be examined and/or photocopied; photograph negatives will be processed and photographs reproduced. Said documents and items are to be produced at the offices of Marks, O'Neill, O'Brien & Courtney, P.C., 913 Market Street, Suite 800, Wilmington, Delaware 19801, and supplemented thereafter in accordance with the Rules of Civil Procedure.

If any document required to be produced by this Request is claimed by you to be not discoverable because it is privileged or for any other reason, then each such document should be identified in your Response by date, sender, recipient, persons to whom copies have been furnished, and subject matter, and the basis for the claim of privilege or other reason should be stated in your Response.

#### REQUESTS

1. Any and all statements, descriptions of statements, summaries of statements, memoranda, records or writing (signed or unsigned) of any and all witnesses, including any statements from the parties herein, or their respective agents, servants or employees, including tapes or other mechanically transcribed information.

RESPONSE:

2. All photographs, recordings, films, charts, sketches, graphs and diagrams taken and/or prepared.

RESPONSE:

3. Any and all reports compiled or prepared by an individual who has been retained as an expert in this matter.

**RESPONSE:** 

4. The names, home and business addresses of all experts contacted.

### **RESPONSE:**

5. All writings, memoranda, date and/or tangible things which related directly or indirectly to the incident and damages set forth in Plaintiff's Complaint.

### **RESPONSE:**

6.	Any and all copies of Internal Revenue Service Tax Returns for five full years
prior to, and a	Il years subsequent to the date referred to in Plaintiff's Complaint.

# **RESPONSE:**

7. Any and all documents, records, evidence and anything whatsoever which will be introduced at trial for use in direct examination or impeachment.

## **RESPONSE:**

8. Any document or thing the plaintiff has read or referred to in preparation of any pleadings in the instant case.

#### RESPONSE:

Marks, O'Neill, O'Brien & Courtney, P.C.

By: Path Clark

Patrick G. Rock, Esquire (I.D. # 4632) Megan T. Mantzavinos, Esquire (I.D. # 3802) 913 North Market Street, Suite 800 Wilmington, DE 19801 (302) 658-6538

Attorney for Defendant CMS

DATED: 50 5 31, 2007

NCERN -DELAWARE DEPARTMENT OF CORRECTIONS PROFESSION REQUEST FOR MEDICAL/DENTAL SICK CALL SERVICES FACILITY: DELAWARE CORRECTIONAL CENTER This request is for (circle one): MEDICAL DENTAL MENTAL HEALTH Date Submitted U.S. Complaint What type of problem are you having)? IT SEEMS LIKE EVERY SINCE SAID DR.OTT ORDEREDI Inmate Signature AUDShe The below area is for medical/use only. Please do not write any further RESIGHVE 2-MONTE O DOW ALL ILA TS DEFICE Temp: SIXOR SEVEN Times, OAILY, Provider Signature & Title 3/1/99 DE01 FORM#: MED 263

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AMERICAN BOARD OF MEDICAL SPECIALTIES®

Case 1:06-

1007 Church Street, Suite 404 Evanston, IL 60201-5913 Phone: 847.491.9091 FAX: 847.328.3596 www.abms.org

JAN 1 0 2001

March 31, 2005

Julian Miller

Unit D-East F-22

Delaware Correctional Center
1181 Paddock Road

Smyrna, DE 19977

Dear Mr. Miller:

Your letter was received at the American Board of Medical Specialties (ABMS) on March 28, 2005. The ABMS is the umbrella organization for 24 medical specialty boards. The main focus of ABMS and its 24 Member Boards is the process of certification of physician specialists in the United States.

The ABMS is not a referral service and does not give recommendations to patients. The ABMS does not process complaints or provide information regarding disciplinary actions that have been filed by the state. The ABMS can verify if a physician is certified by one of its 24 Member Boards.

The Official ABMS Directory of Board Certified Medical Specialists, which is available in many medical and public libraries, would be a useful resource to obtain more information regarding certification status of individual physicians. Also, the ABMS has a public education program which provides verbal verification of board certification at 1-800-CERT (776-2378).

In response to your questions:

<del>-></del>>

- 1) There is no record of a Dr. Sitta Gombeh-Alie in the ABMS database.
- 2) Requirements of a Medical Director are determined by each health care organization. A health care organization can require certification but it is not the law.

It is hoped that this information is helpful to you and satisfactorily responds to your request.

Sincerely,

Shelde ILI

Sheldon D. Horowitz, M.D. Associate Vice President

This Document sin is for

grant Church to see if any

of the Nursen or psychiatrists

or Medical Doctors, had begetinal

Licences to practice.

Members American Board of Allergy & Immunology American Board of Anesthesiology American Board of Colon & Rectal Surgery American Board of Dermatology American Board of Emergency Medicine American Board of Family Medicine American Board of Internal Medicine American Board of Medical Genetics American Board of Neurological Surgery American Board of Nuclear Medicine American Board of Obstetrics & Gynecology American Board of Ophthalmology
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